

COMMENTER	SEQUENCE OF BIDDING	FAVORS COMBINATORIAL BIDDING	FAVORS SPECIAL RULES FOR SWMRS (SMALL, WOMEN, MINORITY BUSINESSES, AND RURAL TELECOM)	FAVORS AUCTION SAFEGUARDS/BIDDER QUALIFICATIONS
Minority PCS Coalition	Oral bids for BTAs	Sealed combinatorial bids for MTAs, but opposes nationwide licensing	Yes, Block "C" should be reserved exclusively for minority-controlled entities	Yes
Motorola	No Position Stated	No Position Stated	Yes	Maintains that it is inappropriate to apply auction process to Mobile Satellite Service ("MSS") applications
Motorola Satellite Communications	No Position Stated	No Position Stated	No Position Stated	Maintains that it is inappropriate to apply auction process to Mobile Satellite Service/ Radio-determination Satellite Service ("MSS/RDSS") applications
George E. Murray	No Position Stated	No Position Stated	Yes	Yes
MW TV	No Position Stated	No Position Stated	No Position Stated	Opposes use of auctions to license MDS

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National Association of Black Owned Broadcasters (NABOB)	Oral bidding Begin largest to smallest markets and license all MTA and BTA frequencies in a given MTA	No Position Stated	Yes	Yes
NABER	Oral bidding	Yes	Yes	Yes
National Rural Telecom Association	No Position Stated	No Position Stated	Yes	Yes, auctions should not apply to microwave links, BETRS, and rural radio frequencies
NTIA	Electronic Iterative Combinatorial Auction ("EICA") which provides bidders greater freedom to choose the geographic combinations	Yes	Yes	Yes
Nextel Communications	Sequential oral bidding BTAs auctioned before MTAs from largest to smallest markets	Yes, sealed bids Participants should be allowed to bid on any and all combinations of licenses	No Position Stated	Yes All licenses should be freely transferrable
NYNEX Corporation	Electronic, simultaneous "English" auctions, with special rules adopted for oral auctions	Yes	No Position Stated	Yes

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OPASTCO	No Position Stated	No Position Stated	Yes	Expand definition of Rural Teleco because at present definition is too restrictive
Pacific Bell and Nevada Bell	Sealed bids auctioned simultaneously	No Position Stated	Yes	Yes
Pacific Telecom Cellular	Auction all frequency blocks in an MTA before proceeding the next MTA sequentially from largest market to smallest	Yes, but no combinatorial bidding for BTAs	Yes	Yes; however, anti-trafficking restrictions should be avoided or minimized
Pagemart	Sealed bidding Sequentially from largest to smallest markets with winners in each round paying a price equal to the lowest winning bid received in that round	Yes, for both narrow- and broadband PCS	Yes	Yes
Paging Network	Oral ascending bids Sequentially in descending order of population from largest to smallest markets	No	Yes	Yes; however, new anti-trafficking rules are not necessary, antitrust rules offer sufficient protection
Palmer Communications	No Position Stated	No Position Stated	Yes	Yes

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Phase One Communications	No Position Stated	No Position Stated	No Position Stated	Requests the FCC to postpone auctioning of radio spectrum and focus on perfecting auction process
Point Communications	Oral bids for individual BTAs	Sealed bids at nationwide and MTA levels with no second-round bids for combinatorial bidding	Yes	Yes Opposes auctions for microwave links
Primoshpere Limited Partnership	No Position Stated	No Position Stated	No Position Stated	Urges the FCC not to subject Satellite-Digital Audio Radio Service licenses to the auction process
Quick Call Group	No Position Stated	No Position Stated	No Position Stated	Opposes use of auctions to license cellular unserved areas, urges FCC to use lotteries as originally planned
Radio Telecom and Technology	No Position Stated	No Position Stated	No Position Stated	Requests FCC to accept rule waivers for IVDS applications processed under auction procedures

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RAM Mobile Data	No Position Stated	No Position Stated	No Position Stated	Auctions for wide-area SMR licenses should be applied to the 900 MHz "Phase II" frequencies, rather than to existing DFA licenses seeking expansion channels
Reason Foundation	No Position Stated	No Position Stated	No Position Stated	United States should use New Zealand's auction experiment as a model of success
Rochester Telephone Company	Oral bidding	Opposes combinatorial bidding for large geographic areas; urges FCC not to accept multiple bids for blocks "A" and "B" Opposes consortium bidding Supports multiple bids for BTAs	Advises FCC to tread with caution any rules established to assist SWMRs participation in auctions	Yes

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Rocky Mountain Telecommunication Assoc. and Western Rural Telephone Assoc.	Hold auctions which allows Rural Telecoms and other protected groups to bid on blocks "A" or "B," without jeopardizing their ability to participate in auctions for blocks "C" and "D"	No Position Stated	Yes, PCS/Cellular ownership restrictions should not apply to blocks "C" and "D" FCC should not apply proposed upfront payment/deposit requirements to Rural Telecoms	Yes
Rural Cellular Association	Oral bidding Smallest to largest markets, and from smallest to largest amount of spectrum	No	Yes, rules should be revised to allow for greater participation by Rural Telecoms	Yes
Rural Cellular Corporation	No Position Stated	No Position Stated	Yes, block "C" should be set aside for Rural Telecoms	Yes, favors simple and direct rules
Rural Electrification Administration	No Position Stated	No Position Stated	No Position Stated	Opposes the use of auctions to license fixed satellite, point-to-point microwave, and rural radio services (incl. BETRS) because of the anticipated hardship resulting to rural telephone companies

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Rural Telephone Company	No Position Stated	Opposes combinatorial bidding for blocks "C" and "D" Supports alternative financing for SWMRs	Yes, supports increasing the size limit of Rural Telecoms	Yes
Santarelli, Smith & Carraccio	No Position Stated	No Position Stated	No Position Stated	Yes, supports simplified initial application requirements and an interactive application processing program
Securicor PMR Systems, Ltd.	No Position Stated	No Position Stated	No Position Stated	It is not "reasonably likely" that the principal use of 220 MHz local licenses will be use to provide service to subscribers for compensation
Steven C. Sloane	No Position Stated	No Position Stated	Yes	Yes
Small Business PCS Assoc.	Sequentially from the largest to smallest markets, beginning with MTAs then proceeding to BTAs	Supports combinatorial bidding for MTAs, but not for BTAs	Yes; however, upfront payment should be refunded to SWMRs if they are not successful and 20% should not be required of SWMRs	Yes

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Small RSA Operators	No Position Stated	No Position Stated	No Position Stated	Opposes use of auctions to license cellular unserved areas as contrary to Congressional intent
Small Telephone Companies of Louisiana	Sequential oral bidding beginning with smaller bands and proceeding to larger ones	No	Yes	Opposes use of auctions for intermediate links Supports increasing size limitation of Rural Telecoms
Southwestern Bell	Sequential oral bidding beginning with MTAs	No because contrary to Congressional intent; however, if FCC conducts combinatorial bidding, it should open sealed nationwide bids before conducting oral bidding	Yes	Yes Opposes use of auctions for licensing private services, and intermediate links
Sprint	No Position Stated	No	Yes; however, the proposed set-asides do not allow enough participation and will not accomplish Congressional intent	Yes, cellular carriers should be allowed to bid for licenses where they are not eligible if they agree to divest ownership after winning a bid
Arlene F. Stregé	No Position Stated	No Position Stated	Yes	Yes

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Suite 21 Group	No Position Stated	No Position Stated	Yes, absent sufficient protections, SWMRs will not be able to effectively compete in auction process	If the FCC decides to license Local Multipoint Distribution Service ("LMDS"), specific measures must be undertaken to ensure compliance with Congressional mandate
Systems Engineering	Group combinatorial bidding should not be allowed for blocks "C" and "D"	No Position Stated	Yes	Yes
Taxpayer Assets Project	No Position Stated	No Position Stated	Yes	Yes
Telephone Association of Michigan	Oral bids	Yes	Yes, supports set-aside of block "D" exclusively for Rural Telecoms	Yes
Telephone and Data Systems	Descending order of spectrum block size and service area population	No	Yes	Yes
Telephone Electronic Corp.	No Position Stated	Yes	Yes, supports aggregation of spectrum in blocks "C" and "D" and expansion of size limitations of both Rural Telecoms and Small Businesses	Yes

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Telmarc Group and Telmarc Telecommunications	Sequential open bidding beginning from largest to smallest markets	Yes, combinatorial blocks will be auctioned in sealed pre-oral auction bid	Yes	Yes
Telepoint Personal Communications	No Position Stated	No Position Stated	Yes	No Position Stated
Telmarc Group	Sequential oral bidding beginning with MTA	No Position Stated	Yes	Yes
Telocator	Sequential oral bidding in descending order of geographic size	No	Yes, prefers bidding preferences, instead of set-asides	Yes
Thumb Cellular	No Position Stated	No Position Stated	No Position Stated	Opposes use of auctions for licensing cellular unserved areas
Time Warner Telecommunications	No Position Stated	No Position Stated	No Position Stated	Yes; however, maintains that auction procedures make antitrafficking restrictions unnecessary Urges FCC not to subject license of intermediate links to auction process

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Tri-State Radio Company	No Position Stated	No Position Stated	Yes, advocates modifications of criterion for small business qualification to allow greater participation Supports ability of SWMRs to form consortia	Yes
TRW	No Position Stated	No Position Stated	No Position Stated	Opposes use of auction process to license Mobile Satellite Service and Radiodetermination Satellite Service licenses
Unique Communications Concepts	No Position Stated	No Position Stated	Yes, advocates additional allocation of spectrum so SWMRs can compete on level playing field with "deep pockets"	Yes
United Native American Telecommunications	No Position Stated	No Position Stated	Yes	No Position Stated
U.S. Intelco Networks	Sequential oral bidding from smallest to largest markets	No Position Stated	Yes, urges reservation of block "C" for Rural Telecom	Yes

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U.S. Small Business Administration, Office of Advocacy	Open, sequential bidding	No	Yes	Yes
USTA	No Position Stated	No Position Stated	Yes	Opposes use of auctions to license BETRS
Utilities Telecommunications Council	No Position Stated	No Position Stated	No Position Stated	Yes Opposes use of auctions to license intermediate links and point-to-point microwave service
Valley Management	No Position Stated	No Position Stated	Yes	Yes
Vanguard Cellular	No Position Stated	No Position Stated	Yes, expand the definition of "Small Business"	Yes
Richard L. Vega Group	Sequential sealed bids from largest to smallest markets Supports electronic bidding	Yes	Yes, opposes combinatorial bidding for blocks "C" and "D"	Opposes use of auctions to license point-to-point microwave licenses
Venus Wireless	No Position Stated	Yes	Yes, opposes combinatorial bidding for blocks "C" and "D"	Yes
WCC Cellular	No Position Stated	No Position Stated	No Position Stated	Opposes use of auctions to license cellular unserved areas

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Western Wireless	No Position Stated	Yes	Yes, requests increase of size limitation for Rural Telecom	Yes
Wireless Cable Assoc.	Oral bidding for Multipoint Distribution Service ("MDS") licenses	Yes, sealed combinatorial bids for MDS licenses	No Position Stated	Yes
Wireless Services Corporation	Oral bidding	No Position Stated	Yes	Yes
Wisconsin Wireless	Sequential ascending oral bidding, from the smallest to the largest markets, beginning with MTAs then proceeding to BTAs	No Position Stated	Yes	Yes